

# FREIMUND JACKSON & TARDIF, PLLC

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MICHAEL E. TARDIF  
JEFFREY A. O. FREIMUND  
AMANDA C. BLEY

August 16, 2017

Kyle Lydell Canty, Inmate #401358  
WA State Department of Corrections  
P.O. Box 900  
Shelton, WA 98584

**RE: Kyle Lydell Canty v. City of Seattle, et al.**  
**USDC Western District No. 2:16-cv-01655 RAJ-JPD**

Dear Mr. Canty:

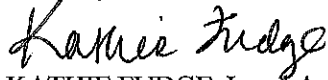
Enclosed please find the following Authorizations and Stipulations which we are requesting your signature so that we can forward to the providers:

1. Harborview Medical Center;
2. King County Adult Detention;
3. Western State Hospital.

We have also enclosed four blank Authorization and Stipulations for you to fill out providing the providers contact information in the blank area on the first page, signing and returning to our office for further processing.

Also enclosed are Defendants City of Seattle, Officer Marshall Coolidge; Officer Sean Culbertson, Officer Timothy Renihan and Officer Andrew Hancock's First Interrogatories and Requests for Production to Plaintiff Kyle Lydell Canty.

Sincerely,



KATHIE FUDGE, Legal Assistant to  
GREGORY E. JACKSON  
206-582-6001

GEJ:kpf  
Enclosures

cc: Samantha D. Kanner, w/Enclosures

Honorable Richard Jones

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

KYLE LYDELL CANTY,

Plaintiff,

vs.

CITY OF SEATTLE, et al.,

Defendants.

NO. 2:16-CV-01655-RAJ-JPD

DEFENDANTS CITY OF SEATTLE,  
OFFICER MARSHALL COOLIDGE,  
OFFICER SEAN CULBERTSON, OFFICER  
TIMOTHY RENIHAN AND OFFICER  
ANDREW HANCOCK'S FIRST  
INTERROGATORIES AND REQUESTS  
FOR PRODUCTION TO PLAINTIFF KYLE  
LYDELL CANTY

TO: KYLE LYDELL CANTY, Plaintiff Pro Se

In accordance with Fed. R. Civ. P. 33, you are required to answer the following interrogatories, separately and fully, under oath, within thirty (30) days of the date of service of these interrogatories upon you.

Also contained herein are requests for production pursuant to Fed. R. Civ. P. 34. Please produce the requested material for inspection and copying by defendant's attorney at the address stated below by no later than thirty (30) days from the date of service. These discovery requests are continuing in nature and you must supplement your responses pursuant to Fed. R. Civ. P. 26(e).

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CITY DEFENDANTS' FIRST  
INTERROGATORIES AND REQUESTS FOR  
PRODUCTION TO PLAINTIFF KYLE  
LYDELL CANTY --  
NO. 2:16-CV-01655-RAJ-JPD

1

FREIMUND JACKSON & TARDIF, PLLC  
701 FIFTH AVENUE, SUITE 3545  
SEATTLE, WA 98104  
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Exhibit 1  
006

**INTERROGATORIES AND REQUESTS FOR PRODUCTION**

**INTERROGATORY NO. 1:** Please identify each person with knowledge of any of the allegations and/or averments of fact contained in Plaintiff's Complaint. Please include a summary of the facts known as well as the current address and telephone number for each person identified.

**ANSWER:**

**REQUEST FOR PRODUCTION A:** Please produce for inspection and copying any document, recording, or electronic data that supports any of the allegations and/or averments of fact identified in Plaintiff's Complaint.

**RESPONSE:**

1 **INTERROGATORY NO. 2:** Please identify and provide a detailed computation of each and  
2 every category of damages that you claim to have suffered as a result of Defendants' alleged  
3 actions. Defendants specifically request that you provide an explanation of damages for the  
4 calculation of each dollar amount in each category.

5 **ANSWER:**  
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13 **INTERROGATORY NO. 3:** Identify any statements, correspondence, letters, emails, blogs,  
14 social media posting (i.e., Facebook, MySpace, Twitter, Instagram, Tumblr), videos (i.e.,  
15 YouTube, Vimeo) or other documents sent to any individual or received from any individual  
(other than attorney/client privilege) related to this litigation or any of the incidents described in  
Plaintiff's Complaint.

16 **ANSWER:**  
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1 **REQUEST FOR PRODUCTION B:** Please produce for inspection and copying any and all  
2 statements, correspondence, letters, emails, blogs, social media postings, tweets, videos or other  
3 documents sent to any individual or received from any individual (other than attorney/client  
4 privilege) relating to this litigation or any of the incidents described in Plaintiff's Complaint.  
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6 **RESPONSE:**  
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12 **INTERROGATORY NO. 4:** Please state the name, address and telephone number of each  
13 health care provider, including mental health care, who has treated or examined you during the  
14 ten (10) years preceding the incidents alleged in Plaintiff's Complaint.

15 **ANSWER:**  
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1 **REQUEST FOR PRODUCTION C:** Please produce for inspection and copying all medical,  
2 hospital, and other health care records from treatment providers listed in the preceding  
3 interrogatory. This request can be satisfied by completing and signing the attached authorizations  
4 allowing defense counsel to obtain health care records.

5 **RESPONSE:**

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10 **INTERROGATORY NO. 5:** Have you ever been convicted of or pled guilty to a felony?  
11 And, have you ever been convicted of or pled guilty to a misdemeanor involving dishonesty or  
12 false statement? If so, state for each:

- 13 (a) The name of the crime charged and the crime convicted of;  
14 (b) The date of the charge and conviction;  
15 (c) The date and place of the conviction and sentence imposed; and  
16 (d) The court and case number.

17 **ANSWER:**

1 **INTERROGATORY NO. 6:** Have you been a party to any lawsuits, including bankruptcy  
2 and/or divorce proceedings, in the past ten (10) years? If so, provide:

- 3 (a) A description of the nature of lawsuit;  
4 (b) The names of parties (or case name);  
(c) The court and cause number;  
(d) The outcome of lawsuit.

5 **ANSWER:**  
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14 **INTERROGATORY NO. 7:** Please state your educational history beginning with high  
15 school, including the name of each institution attended, any degrees and honors received, and  
16 dates of attendance.

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1 **INTERROGATORY NO. 8:** Please list the name and address of each of your employers for  
2 the past ten (10) years (including yourself if you were self-employed).

3 **ANSWER:**  
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11 **INTERROGATORY NO. 9:** Did you drink any alcoholic beverages within 24 hours prior to the  
12 incident referred to in the Complaint? If so, state:

- 13 (a) When and where;  
14 (b) Names and addresses of persons present;  
15 (c) Amount consumed.

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1 **INTERROGATORY NO. 10:** Did you take any drug, narcotic, sedative, tranquilizer or other  
2 form of medication within 24 hours before the incident referred to in the Complaint? If so, for  
3 each preparation please state the identity of the preparation, the date taken, the amount taken, the  
reason for taking it, and if procured under a prescription, the name and address of the person  
prescribing it.

4 **ANSWER:**  
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11 **INTERROGATORY NO. 11:** Have you ever been involuntarily committed in Washington state  
12 or in any other jurisdiction prior to the incidents alleged in Plaintiff's Complaint? If so, please  
state:

- 13 (a) The name of the county and state of the commitment;  
14 (b) The date of the commitment;  
(c) The place of the commitment; and  
(d) The court and case number.

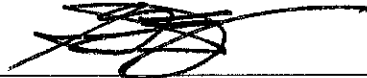
15 **ANSWER:**  
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1 **INTERROGATORY NO. 12:** Were you ever evaluated, diagnosed or treated for a mental  
2 health condition prior to the incidents alleged in Plaintiff's complaint? If so, please state:

- 3 (a) The date of the evaluation, diagnosis or treatment;  
4 (b) The name and address of the mental health professional evaluating, diagnosing  
or treating you for the mental health condition; and  
5 (c) The mental health conditions you were diagnosed with, if any.

6 **ANSWER:**

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10 DATED this 15 day of August, 2017.

11  
12   
13 GREGORY E. JACKSON, WSBA #17541  
14 JOHN R. NICHOLSON WSBA #30499  
15 AMEE J. TILGER, WSBA #34613  
16 Freimund Jackson & Tardif, PLLC  
17 701 5th Avenue, Suite 3545  
18 Seattle, WA 98104  
19 Telephone: (206) 582-6001  
20 Facsimile: (206) 466-6085  
21 gregj@fjtlaw.com  
22 Attorneys for Defendants City of Seattle,  
23 Officer Marshall Coolidge, Sean Culbertson,  
24 Timothy Renihan and Officer Hancock  
25  
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**DECLARATION OF RESPONDING PARTY**

I declare under the penalty of perjury under the laws of the State of Washington that I am the Plaintiff in this action and am authorized to make the foregoing answers. I declare under penalty of perjury that that have read the foregoing answers, know the contents thereof, and believe them to be true and correct.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_,  
Washington.

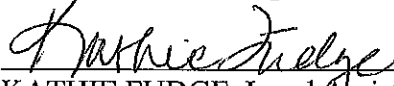
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KYLE LYDELL CANTY

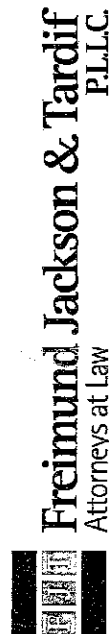
**CERTIFICATE OF SERVICE**

I certify that on the 16th day of August, 2017, I caused a true and correct copy of this document to be served on the following in the manner indicated below:

Pro se Plaintiff, Kyle Lydell Canty, #401358 WA State Department of Corrections P.O. Box 900 Shelton, WA 98584	( X ) U.S. Mail
Samantha D. Kanner, WSBA #36943 Deputy Prosecuting Attorney King County Prosecuting Attorney's Office 500 Fourth Avenue, 9 <sup>th</sup> Floor Seattle, WA 98104	( X ) U.S. Mail

DATED this 16th day of August, 2017, in Seattle, Washington.

  
 KATHIE FUDGE, Legal Assistant to  
 GREGORY E. JACKSON  
 701 5<sup>TH</sup> Avenue, Suite 3545  
 Seattle, WA 98104  
 kathief@fjtlaw.com



701 Fifth Avenue, Suite 3545, Seattle, WA 98104 | [fitlaw.com](http://fitlaw.com)



**Kyle Lydell Canty, Inmate #401358  
-WA State Department of Corrections**

**◆P.O. Box 900◆  
Shelton, WA 98584**

Refused by offender

12 May 2009

BC: 98104701595 0127N244213-01573

RETURN TO SENDER  
REFUSED  
UNABLE TO FORWARD

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Exhibit 1  
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